

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Iva Bonelli

Debtor(s)

CHAPTER 13

Nationstar Mortgage LLC d/b/a Mr. Cooper

Plaintiff

vs.

NO. 20-14471 ELF

Iva Bonelli

Defendant

ADV. NO. 21-00084

JOINT PROPOSED DISCOVERY AND PRETRIAL SCHEDULE

1. On or about February 15, 2022, this Court entered a Pre-Trial Order for the above-captioned adversary action.
2. On or about March 1, 2022, counsel for Plaintiff and for Defendant discussed the case and the scheduling deadlines.
3. Additionally, the parties have engaged in settlement discussions.
4. Due to the settlement discussions and to ensure that there is sufficient time for discovery, should it be needed, both Parties are respectfully requesting that all deadlines and dates in the Court's issued Order be extended approximately thirty (30) days.
5. Plaintiff and Defendant are requesting that the Scheduling Order Deadlines and Dates be amended as follows:

A. All discovery shall be completed on or before **May 12, 2022**.

B. All expert witnesses shall be identified and a copy of each expert's report shall be provided to every other party, in accordance with Fed. R. Civ. P. 26(a)(2) on or before **May 26, 2022**.

C. All discovery disclosures pursuant to Fed. R. Civ. P. 26(a)(3) shall be served on opposing parties and filed with the bankruptcy court on or before **May 26, 2022**

D. Any objections to Rule 26(a)(3) disclosures shall be served on opposing counsel and filed with the bankruptcy court on or before **June 3, 2022**.

C. All motions to amend the pleadings, or for summary judgment, shall be filed on or before **June 3, 2022**. If such a motion or motions is/are filed, the parties are not relieved of their obligation to comply with the terms of the balance of this Pretrial Order.

D. All discovery disclosures pursuant to Fed. R. Civ. P. 26(a)(3) shall be served on opposing parties and filed with the bankruptcy court on or before **August 15, 2021**.

E. Any objections to the Rule 26(a)(3) disclosures shall be served on opposing parties and filed with the bankruptcy court on or before **September 1, 2021**.

F. A mandatory final pretrial/settlement conference shall be held on _____, at 10:00 a.m. in Bankruptcy Courtroom No. 1, Robert N.c. Nix Federal Building & Courthouse, 900 Market Street, Second Floor, Philadelphia, Pennsylvania.

6. Plaintiff has left the date blank for the mandatory pretrial/settlement conference so that this Court may choose a date that works best for the Court's schedule.
7. Both Plaintiff and Defendant concur with this request.

WHEREFORE, Plaintiff and Defendant respectfully request that the February 15, 2022 Scheduling Order be amended as proposed.

March 8, 2022

/s/Rebecca A. Solarz, Esq.

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